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Attorneys for LIBERTY INSURANCE  
CORPORATION

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

BRAD KEARNS, an individual; and  
ELIZABETH KEARNS, an individual,

Plaintiffs,

v.

LIBERTY INSURANCE CORPORATION, a  
foreign Corporation; DOES I-XXX; ABC  
CORPORATIONS A-Z,

Defendants.

Case No. 3:24-cv-00060-MMD-CSD

**STIPULATION TO EXTEND DEADLINE  
FOR LIBERTY INSURANCE  
CORPORATION TO FILE ITS REPLY IN  
SUPPORT OF ITS MOTION TO DISMISS**

**(First Request)**

COMES NOW DEFENDANT LIBERTY INSURANCE CORPORATION (“Defendant Liberty”) AND PLAINTIFFS BRAD KEARNS AND ELIZABETH KEARNS (“Plaintiffs” and collectively, the “Parties”), by and through their respective counsel of record, and hereby stipulate that the time by which Defendant Liberty must file its Reply in Support of its Motion to Dismiss (ECF No. 8) is enlarged and extended by one week from March 06, 2024 to and including March 13, 2024. Defendant Liberty filed its Motion to Dismiss on February 14, 2024 (ECF No. 8) and Plaintiffs filed their Response thereto on February 28, 2024 (ECF No. 15).

Due to the numerous and complex issues at bar, Defendant Liberty needs additional time to

1 draft a meaningful Reply. As such, the Parties maintain good cause exists to extend the deadline for  
2 Defendant Liberty to file its Reply in support of its Motion to Dismiss by one week to Wednesday  
3 March 13, 2024.

4 This is the first request for extension of time for Defendant Liberty to file its Reply in support  
5 of its Motion to Dismiss.

6 Dated: March 05, 2024

LEVERTY & ASSOCIATES LAW CHTD.

7  
8 By: /s/ Patrick R. Leverty  
Patrick R. Leverty, Esq.  
9 Nevada Bar No. 8840  
10 Attorney for Plaintiffs Brad Kearns and Elizabeth  
Kearns

11  
12 Dated: March 05, 2024


McCORMICK, BARSTOW, SHEPPARD,  
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13  
14 By: /s/ Jonathan W. Carlson  
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15 Nevada Bar No. 10536  
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18 Nevada Bar No. 16218  
Attorneys for Defendant Liberty Insurance Corporation

19 9717972.1

20  
21 IT IS SO ORDERED.

22 Dated: 3/6/2024

23   
U.S. DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of March, 2024, a true and correct copy of **STIPULATION TO EXTEND DEADLINE FOR LIBERTY INSURANCE CORPORATION TO FILE ITS REPLY IN SUPPORT OF ITS MOTION TO DISMISS** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Cheryl A. Schneider  
Cheryl A. Schneider, an Employee of  
McCORMICK, BARSTOW, SHEPPARD,  
WAYTE & CARRUTH LLP